# EXHIBIT 48

From: Oluwole, Chautney M.

Sent: Thursday, April 23, 2020 4:02 PM

To: Porter, Katherine

Cc: purdue.dpw.diligence; Clarens, Margarita; Duggan, Charles S.; Huebner, Marshall S.;

**PURDUE AKIN LIT** 

Subject: RE: Purdue Diligence Priority - Reporting to States

Hi Katherine,

We cannot say definitively that Maine, Ohio and Virginia are the only states that made specific requests. The responsive information that we've provided is all that we are aware of at the moment after conducting a reasonable search, which included co-counsel reaching out to individuals at the company who would be best positioned to know and speaking to other counsel who were involved in these matters. We are continuing to explore with co-counsel on whether additional responsive materials may be available. We will keep you posted on our findings.

Thanks.

Chautney

### Chautney M. Oluwole

### Davis Polk & Wardwell LLP

901 15th Street NW | Washington, DC 20005 +1 202 962 7134 tel | mobile

chautney.oluwole@davispolk.com

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From: Porter, Katherine <kporter@akingump.com>

Sent: Tuesday, April 21, 2020 11:14 AM

To: Oluwole, Chautney M. <chautney.oluwole@davispolk.com>

Cc: purdue.dpw.diligence <purdue.dpw.diligence@davispolk.com>; Clarens, Margarita

<margarita.clarens@davispolk.com>; Duggan, Charles S. <charles.duggan@davispolk.com>; Huebner, Marshall S.

<marshall.huebner@davispolk.com>; PURDUE AKIN LIT <PURDUEAKINLIT@akingump.com>

Subject: RE: Purdue Diligence Priority - Reporting to States

Hi Chautney,

Could you please confirm whether Maine, Ohio, and Virginia are the only states that made specific requests?

Katherine Porter

Direct: +1 212.872.7467 | Internal: 37467

# UNREDACTE19-23649454\$ O DOTI21654FESSION A2\$18120\$ O Entered 12\$12012018039156 N I Exhibits 48 RIVILEGED COMMUNICATIONS - TREAP & BOTE TO PROTECTIVE ORDER

From: Oluwole, Chautney M. <chautney.oluwole@davispolk.com>

Sent: Tuesday, April 14, 2020 10:20 AM

**To:** Porter, Katherine < <a href="mailto:kporter@akingump.com">kporter@akingump.com</a>>

Cc: purdue.dpw.diligence <purdue.dpw.diligence@davispolk.com>; Clarens, Margarita

<margarita.clarens@davispolk.com>; Duggan, Charles S. <charles.duggan@davispolk.com>; Huebner, Marshall S.

<marshall.huebner@davispolk.com>; PURDUE AKIN LIT <PURDUEAKINLIT@akingump.com>

Subject: RE: Purdue Diligence Priority - Reporting to States

Hi Katherine,

Hope you and the family are holding up OK.

After conducting a reasonable search, co-counsel have determined that Maine, Virginia and Ohio made specific requests following the 2007 settlements. They have located the company's responses to those requests, which were included in yesterday's production. The Bates stamp for this document is PPLPUCC500152282.

Also, Ohio's requests will be included in the next production, but after reasonable diligence, they have been unable to locate the specific requests from Virginia and Maine.

Let us know if you have additional questions.

Thanks,

Chautney

### Chautney M. Oluwole

#### Davis Polk & Wardwell LLP

901 15th Street NW | Washington, DC 20005 +1 202 962 7134 tel | mobile

chautney.oluwole@davispolk.com

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From: Oluwole, Chautney M.

Sent: Tuesday, April 7, 2020 7:54 PM

To: 'Porter, Katherine' <kporter@akingump.com>

Cc: purdue.dpw.diligence <purdue.dpw.diligence@davispolk.com>; Clarens, Margarita

<margarita.clarens@davispolk.com>; Duggan, Charles S. <charles.duggan@davispolk.com>; Huebner, Marshall S.

<marshall.huebner@davispolk.com>; 'PURDUE AKIN LIT' <PURDUEAKINLIT@akingump.com>

Subject: RE: Purdue Diligence Priority - Reporting to States

Hi Katherine,

Hope you are well.

We can confirm that the company provided reports to the NY Office of the Attorney General by the Auditor appointed pursuant to the NY Assurance of Discontinuance dated August 19, 2015. These reports were produced in the MDL and can be found at the following Bates numbers:

# UNREDACTE19-23649454\$ O DOGI21654FESSION A2\$18120\$ O Entered 12\$12012018039156N I Exhibits 48 RIVILEGED COMMUNICATIONS - TREAP 64 4 25 TO PROTECTIVE ORDER

- First auditor report: PPLP004473667-PPLP004473708;
- Second auditor report: PPLP004473709-PPLP004473737; and
- Final auditor report: PPLP004473738-PPLP004473756.

We are continuing to follow up with the company's other counsel to determine if there were additional state specific requests made following the 2007 settlements, and if so, any responses provided by the company. We will be in touch as soon as we can.

Thanks,

Chautney

### Chautney M. Oluwole

#### Davis Polk & Wardwell LLP

901 15th Street NW | Washington, DC 20005 +1 202 962 7134 tel | mobile chautney.oluwole@davispolk.com

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From: Oluwole, Chautney M.

Sent: Thursday, April 2, 2020 9:39 AM

To: 'Porter, Katherine' <kporter@akingump.com>

Cc: purdue.dpw.diligence < purdue.dpw.diligence@davispolk.com >; Clarens, Margarita

<margarita.clarens@davispolk.com>; Duggan, Charles S. <charles.duggan@davispolk.com>; Huebner, Marshall S.

<marshall.huebner@davispolk.com>; PURDUE AKIN LIT <PURDUEAKINLIT@akingump.com>

Subject: RE: Purdue Diligence Priority - Reporting to States

Morning Katherine,

Hope you are well.

We will look into this and revert.

Thanks,

Chautney

### Chautney M. Oluwole

Davis Polk & Wardwell LLP

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chautney.oluwole@davispolk.com

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From: Porter, Katherine <kporter@akingump.com>

Sent: Wednesday, April 1, 2020 10:16 PM

To: Oluwole, Chautney M. <<u>chautney.oluwole@davispolk.com</u>>

Cc: purdue.dpw.diligence <purdue.dpw.diligence@davispolk.com>; Clarens, Margarita

<margarita.clarens@davispolk.com>; Duggan, Charles S. <charles.duggan@davispolk.com>; Huebner, Marshall S.

<marshall.huebner@davispolk.com>; PURDUE AKIN LIT <PURDUEAKINLIT@akingump.com>

Subject: RE: Purdue Diligence Priority - Reporting to States

Dear Chautney,

Thanks for your answer. We understand that the Debtors have produced the three mandatory annual ADD reports pursuant to 24(e) of the final order from the 2007 state AG settlements. However, pursuant to 24(f), state AGs also had the right to obtain "state specific" information upon written request outside of the three-year reporting period. Communications regarding such requests are also responsive to the our requests. Can you please confirm that requests pursuant to 24(f) of the state settlements (or pursuant to state law) and Purdue's subsequent responses were also produced, to the extent that they were made by the states?

Thanks again for all your assistance,

#### **Katherine Porter**

Direct: <u>+1 212.872.7467</u> | Internal: <u>37467</u>

From: Oluwole, Chautney M. < <a href="mailto:chautney.oluwole@davispolk.com">chautney.oluwole@davispolk.com</a>

Sent: Wednesday, April 1, 2020 12:37 PM

To: Porter, Katherine <kporter@akingump.com>

**Cc:** purdue.dpw.diligence < <u>purdue.dpw.diligence@davispolk.com</u>>; Clarens, Margarita

<margarita.clarens@davispolk.com>; Duggan, Charles S. <charles.duggan@davispolk.com>; Huebner, Marshall S.

<marshall.huebner@davispolk.com>; PURDUE AKIN LIT <PURDUEAKINLIT@akingump.com>

Subject: RE: Purdue Diligence Priority - Reporting to States

Hi Katherine,

We believe the documents produced provide a comprehensive response. It is possible that other documents "responsive" to the request might exist, but our understanding after discussing with other counsel for the Company is that there is not likely to be much, if anything, that adds to the substance of the documents provided and searching for any such additional documents would be both time consuming and expensive.

Let us know if you have additional questions.

Thanks,

Chautney

## Chautney M. Oluwole

Davis Polk & Wardwell LLP

901 15th Street NW | Washington, DC 20005 +1 202 962 7134 tel | mobile chautney.oluwole@davispolk.com

# UNREDACTE19-23649454\$ O DOGI21654FESSION A2\$18720\$ O Entered 012/148/20\18089\56\n I Exhibits 48 RIVILEGED COMMUNICATIONS - TREAP (\$660 fEVET TO PROTECTIVE ORDER

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From: Porter, Katherine < kporter@akingump.com >

Sent: Friday, March 27, 2020 6:49 PM

To: Oluwole, Chautney M. < <a href="mailto:chautney.oluwole@davispolk.com">chautney.oluwole@davispolk.com</a>>

Cc: purdue.dpw.diligence <purdue.dpw.diligence@davispolk.com>; Clarens, Margarita

<margarita.clarens@davispolk.com>; Duggan, Charles S. <charles.duggan@davispolk.com>; Huebner, Marshall S.

<marshall.huebner@davispolk.com>; PURDUE AKIN LIT <PURDUEAKINLIT@akingump.com>

Subject: Re: Purdue Diligence Priority - Reporting to States

Thank you Chautney, much appreciated. Is this the complete universe of these documents or are more forthcoming?

Sent from my iPhone

On Mar 27, 2020, at 4:06 PM, Oluwole, Chautney M. <<u>chautney.oluwole@davispolk.com</u>> wrote:

### \*\*EXTERNAL Email\*\*

Hi Katherine,

We've discussed this request with Dechert and Wiggins, and they confirmed that the MDL production included correspondence to the Ohio Attorney General relating to Purdue's compliance with the 2007 Consent Judgments between Purdue and twenty-seven Attorneys General.

The production includes a binder called "AG Communications Chron." The binder and its enclosed documents begin at Bates number PPLP004431774. Most of the annual letters are included in this binder, and their specific Bates numbers are listed below. The May 7, 2008 letter appears to not be in that binder, but an alternate Bates number for this letter is also included below.

- August 6, 2007: PPLP004431832-PPLP004431853
- June 20, 2007: PPLP004431854-PPLP004431868
- May 7, 2008: PPLPC051000115675-PPLPC051000115682
- May 7, 2009: PPLP004431807-PPLP004431815
- May 7, 2010: PPLP004431793-PPLP004431801

Let us know if you have any questions.

Thanks,

Chautney

Chautney M. Oluwole

Davis Polk & Wardwell LLP

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901 15th Street NW | Washington, DC 20005 +1 202 962 7134 tel | mobile chautney.oluwole@davispolk.com

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From: Porter, Katherine <kporter@akingump.com>

Sent: Thursday, March 26, 2020 12:08 PM

To: Oluwole, Chautney M. <chautney.oluwole@davispolk.com>; purdue.dpw.diligence

<purdue.dpw.diligence@davispolk.com>; Clarens, Margarita <margarita.clarens@davispolk.com>;

Duggan, Charles S. < <a href="mailto:charles.duggan@davispolk.com">charles S. < charles.duggan@davispolk.com</a>; Huebner, Marshall S.

<marshall.huebner@davispolk.com>

Cc: PURDUE AKIN LIT < PURDUEAKINLIT@akingump.com > Subject: Purdue Diligence Priority - Reporting to States

Dear Chautney,

As part of your efforts to respond to our outstanding requests, could you please include among your priorities any communications between Purdue and the states regarding reporting and compliance following the 2007 settlements, especially annual reporting communications? If these have already been provided, we would appreciate if you could identify the bates range. If they have not, we would be very grateful if you could provide the documents within the next business week.

If you have any questions or would like to discuss timing considerations, of course please let me know.

I trust you are staying safe. Best, Katherine

# Katherine Porter AKIN GUMP STRAUSS HAUER & FELD LLP

One Bryant Park | New York, NY 10036-6745 | USA | Direct: <u>+1 212.872.7467</u> | Internal: <u>37467</u> Fax: +1 212.872.1002 | <u>kporter@akingump.com</u> | <u>akingump.com</u> | <u>Bio</u>

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